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Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Nicoleta Maria Tulai,

Plaintiff,

v.

Merrick Garland, Attorney General of the
United States of America; Alejandro
Mayorkas, Secretary of Department of
Homeland Security; Ur Jaddou, U.S.
Citizenship and Immigration Services;
Richard T. Murray, Field Office Director,
Reno Field Office U.S. Citizenship and
Immigration Services,

Defendants.

Case No. 3:23-cv-00351-LRH-CLB

**Order Granting Stipulation to Extend
the United States' Deadline to Answer
or otherwise respond to Plaintiff's
Petition for De Novo Review of Denial
of N-400 Application for Naturalization
[ECF No. 1]**

(Second Request)

Plaintiff, Nicoleta Maria Tulai, through counsel, and the United States of America,
on behalf of Federal Defendants, through counsel, hereby agree and stipulate to extend the
deadline to answer or otherwise respond to Plaintiff's Petition for De Novo Review of
Denial of N-400 Application for Naturalization by an additional 30 days, until **March 4,
2024**.¹ The parties enter into this stipulation based on the following:

1. Plaintiff filed her Petition on July 14, 2023 (ECF No. 1).

¹ 30 days from February 1, 2024 is March 2, 2024. March 2, 2024 falls on a Saturday.
The first weekday 30 days from the current deadline is March 4, 2024.

1 2. Plaintiff served the United States with a copy of the Summons and Petition
2 on November 6, 2023.

3 3. The original deadline for Federal Defendants to answer or otherwise respond
4 was January 2, 2024. The parties stipulated (ECF No. 7) and the Court granted (ECF
5 No.8) a 30-day extension to allow the parties to continue to work through this case in
6 hopes of resolving without the Court's intervention.

7 4. Since the filing and serving of the Petition, and the granting of the first
8 extension, the parties have continued to engage in additional and productive discussions
9 that may resolve the issues in this case without the Court's intervention. The requested
10 additional 30-day extension will allow the parties additional time to work with their clients
11 to allow for additional discussion. Should the parties be able to resolve the matter without
12 further litigation, a dismissal will follow. Should the parties be unable to resolve the matter
13 without Court intervention, Federal Defendants will move forward with responding to
14 Plaintiffs' Petition on or before **March 4, 2024**. Accordingly, the parties believe good cause
15 exists for the extension in the interest of judicial economy and the parties' resources.

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1 Therefore, the United States requests that the Court extend the deadline for the
2 United States to answer or otherwise respond to **March 4, 2024**.

3 Respectfully submitted this 31st day of January 2024.

4 JASON M. FRIERSON
5 United States Attorney

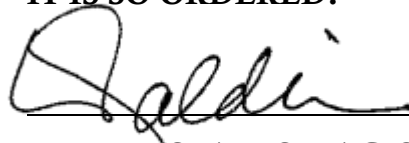
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11 *Attorney for Plaintiff*

12 /s/ Skyler H. Pearson
13 SKYLER H. PEARSON
14 Assistant United States Attorney

15 *Attorneys for the United States*

16 **IT IS SO ORDERED:**

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19 UNITED STATES MAGISTRATE JUDGE

20 **DATED:** January 31, 2024
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